

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STAG WILLIAMSPORT, LLC,

Plaintiff,

v.

BHN ASSOCIATES, LLC,

Defendant.

Civil Action No.
1:21-cv-11958-NMG

**PLAINTIFF STAG WILLIAMSPORT, LLC’S RESPONSE TO REPORT AND
RECOMMENDATION ON DEFENDANT BHN ASSOCIATES, LLC’S COUNSEL’S
MOTION TO WITHDRAW REPRESENTATION AND STAY PROCEEDINGS**

On June 27, 2023, Counsel for Defendant BHN Associates, LLC (“BHN”) filed their Motion to Withdraw as Counsel and Stay Proceedings (“Motion to Withdraw”). Doc No. 57. Plaintiff STAG Williamsport, LLC (“STAG”) responded to the Motion to Withdraw, in which it only objected to the proposed length of the stay requested in the Motion to Withdraw. Doc. No. 60. On June 30, 2023, the Motion to Withdraw was assigned to the Honorable Judge Magistrate Jennifer C. Boal. On July 11, 2023, Judge Magistrate Boal issued her Report and Recommendation. Doc. No. 68.

STAG does not object to the Report or Recommendation. Rather, to prevent further delay in this matter STAG requests that the Report or Recommendation be immediately adopted and/or that the recommended stay run from the July 11, 2023 date of the Report and Recommendation. STAG also notes to the Court that it filed its Motion to Compel on June 22, 2023 (Doc. No. 55), which was prior to the Motion to Withdraw, and that the time for BHN to respond and/or oppose the Motion to Compel expired on July 6, 2023.

Respectfully submitted,

STAG WILLIAMSPORT, LLC

By its attorneys,

/s/ Benjamin M. Greene

Benjamin M. Greene, BBO# 696850

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Date: July 18, 2023

CERTIFICATE OF SERVICE

I, Benjamin M. Greene, hereby certify that on this 18th day of July, 2023, I caused a copy of the within document to be filed and served on all counsel of record via the electronic filing system for the U.S. District Court, District of Massachusetts.

Additionally, I caused a copy of the within document to be sent via first class mail to the Defendant at:

BHN Associates LLC

Attn: Mordy Wider

240 Adar Ct.

Monsey, NY 10952

/s/ Benjamin M. Greene

Benjamin M. Greene